

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

TRUE RELIGION APPAREL, INC.; GURU DENIM,  
INC.,

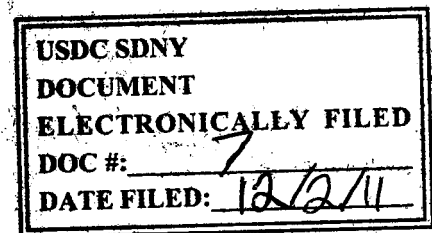
Plaintiffs,

v.

XIAOKANG LEI D/B/A  
TRUERELIGIONJEANS4OUTLET.COM; LIN JIANYU  
D/B/A TRUERELIGIONJEANSOUTLET8.COM; ZHAO  
YANG QU D/B/A TRUERELIGION2CHEAP.COM;  
RONGLIAN LU D/B/A TOPTRJEANS.COM;  
FORTRUERELIGIONJEANS.COM D/B/A  
FASHIONJEANSHOP@GMAIL.COM; XIN JIE KOU  
D/B/A TRUERELIGIONSALE.CO.UK; JIAQIAO LV  
D/B/A TRUERELIGION2CHEAP.COM; ZHAO YANG  
QU D/B/A TRUERELIGION2CHEAP.COM;  
WANGMING D/B/A JEANSWHOLESALE.COM;  
SERVICE@TRUERELIGIONLIKE.COM D/B/A  
OBCS001@HOTMAIL.COM D/B/A  
TRUERELIGIONLIKE.COM;  
CHEAPERTRUERELIGIONJEANS.NET D/B/A  
JACKROSEGATES@GMAIL.COM; XIAOYU CHEN  
D/B/A SH12345602@HOTMAIL.COM D/B/A  
CHEAPTRUERELIGIONJEANSOUTLETS.COM; LUCY  
KING D/B/A LUCYKING88@YAHOO.COM D/B/A  
MYFASHIONJEANS.COM; TOM SMITH D/B/A  
KICKSONFOOT@GMAIL.COM D/B/A  
BUYTRUERELIGIONJEANS.NET D/B/A  
QIQUWANG.NET; QIN KE D/B/A  
CHEAPTRUERELIGIONJEANSSALE@HOTMAIL.COM  
D/B/A MRSHUANG123@HOTMAIL.COM; TAN JUN  
D/B/A WORLD203@HOTMAIL.COM D/B/A  
BTWGOLD4@HOTMAIL.COM; JINGSHUN HUANG  
D/B/A HAOTIAN INTERNATIONAL INDUSTRIAL  
CO., LTD. D/B/A NIKECOOL.COM; CHEN JINSHAN  
D/B/A HONG KONG TIMES SQUARE TRADING CO.,  
LTD. D/B/A V9MAIL.COM; CHEN ZHIFENG D/B/A  
ZHIF\_CHEN@163.COM D/B/A HONG KONG JAVON  
TRADE LTD. D/B/A TINRUI.COM; LI FENGNIAN  
D/B/A FENG08183@SOHU.COM D/B/A CHEAP SKYS  
CO. LTD. D/B/A CHEAP-SKYS.COM; SHOES-GOOGLE

Civil Action No. 11-cv-8242 (HB)

**[FILED UNDER SEAL  
PURSUANT TO 15 U.S.C.  
§ 1116]**



CO., LTD. D/B/A GOTRADINGZONE.COM D/B/A  
 GOTRADINGZONE@HOTMAIL.COM; GUOFANG  
 XIAO D/B/A EMAIL598269039@QQ.COM D/B/A  
 TONGHE TRADE CO., LTD. D/B/A  
 THE9THSTREET.COM; BRANDSTRIBE CO., LTD.  
 D/B/A BRANDSTRIBE.COM D/B/A  
 ALICEWENNE@HOTMAIL.COM D/B/A  
 SALES@BRANDSTRIBE.COM D/B/A  
 BRANDSTRIBE@HOTMAIL.COM D/B/A  
 BRANDSTRIBEINFO@YAHOO.COM; XUBEICHAO  
 D/B/A TRADEMEMOMENT CO. LTD. D/B/A  
 TRADEMOMENT.COM; YEMAO D/B/A SHUNYUAN  
 INTERNATIONAL EXPORT CO. D/B/A  
 TRADE88N.COM D/B/A  
 TRADE88CN@HOTMAIL.COM; WANG FOYUN D/B/A  
 FASHIONCHOOSE TRADE CO., LTD. D/B/A  
 FASHIONCHOOSE.COM D/B/A  
 WYZSHOES@HOTMAIL.COM; WWW.BESTKF.COM  
 D/B/A WZJ886@LIVE.CN D/B/A  
 — WUQIUPING2004@163.CN; CHENZHONG D/B/A  
 FASHION TRADING COMPANY D/B/A  
 FASHION2011STORE.COM D/B/A  
 ZOU1973@HOTMAIL.COM; ALLEN IEE D/B/A CHEER  
 TRADE COMPANY D/B/A CHEERWHOLESALE.COM;  
 LIN HAO D/B/A HONG KONG FAIRY  
 INTERNATIONAL, LTD. D/B/A MORIVER-  
 TRADE.COM D/B/A MOONRIVER-  
 TRADE@HOTMAIL.COM; XIAO XU D/B/A  
 TRADEVOID SHOES TRADING CO., LTD. D/B/A  
 TRADEVOID.COM; HUANG JINFENG D/B/A HAPPY  
 SPORTS INDUSTRY CO., LTD. D/B/A  
 PENGFASHIONSHOES.COM; WEI JIANGGUANG  
 D/B/A CHINARG002@126.COM D/B/A LONGFENG  
 INDUSTRY CO., LTD. D/B/A  
 LONGFENGTRADE.COM; XIAOFANG NI D/B/A WIWI  
 TRADE CO., LTD. D/B/A WIWITRADE.COM D/B/A  
 WIWITRADE@HOTMAIL.COM; CHEN ZIU SONG  
 D/B/A LRGJEANS008@HOTMAIL.COM D/B/A  
 JERSEY TRADE CO. LTD. D/B/A  
 AAANBAJERSEY.COM; HONEST99896 D/B/A  
 DAJIAHAO662009@HOTMAIL.COM;  
 FERSHOUHELLO D/B/A  
 XUHUAN0123@YAHOO.COM.CN; ZHAOMIN8898  
 D/B/A ZHAOMIN82@YAHOO.COM; TUNIAN1 D/B/A  
 402590112@QQ.COM; LINA669925 D/B/A  
 YANGYINGHUI0123@YAHOO.COM.CN; AND  
 TRUEYES85 D/B/A LYGANG2010@YAHOO.COM.CN,

XYZ COMPANIES, AND JOHN AND JANE DOES,  
Defendants.

**TEMPORARY RESTRAINING ORDER, ORDER TO DISABLE CERTAIN WEB SITES,  
ASSET RESTRAINING ORDER, EXPEDITED DISCOVERY ORDER AND ORDER TO  
SHOW CAUSE FOR PRELIMINARY INJUNCTION**

Plaintiffs TRUE RELIGION APPAREL, INC. and GURU DENIM, INC. (collectively, “True Religion” or “Plaintiffs”) having moved *ex parte* against Defendants XIAOKANG LEI d/b/a TRUERELIGIONJEANS4OUTLET.COM; LIN JIANYU d/b/a TRUERELIGIONJEANSOUTLET8.COM; ZHAO YANG QU d/b/a TRUERELIGION2CHEAP.COM; RONGLIAN LU d/b/a TOPTRJEANS.COM; FORTRUERELIGIONJEANS.COM d/b/a FASHIONJEANSHOP@GMAIL.COM; XIN JIE KOU d/b/a TRUERELIGIONSALE.CO.UK; JIAQIAO LV d/b/a TRUERELIGION2CHEAP.COM; ZHAO YANG QU d/b/a TRUERELIGION2CHEAP.COM; WANGMING d/b/a JEANSWHOLESALE.COM; SERVICE@TRUERELIGIONLIKE.COM d/b/a OBCS001@HOTMAIL.COM d/b/a TRUERELIGIONLIKE.COM; CHEAPERTRUERELIGIONJEANS.NET d/b/a JACKROSEGATES@GMAIL.COM; XIAOYU CHEN d/b/a SH12345602@HOTMAIL.COM d/b/a CHEAPTRUERELIGIONJEANSOUTLETS.COM; LUCY KING d/b/a LUCYKING88@YAHOO.COM d/b/a MYFASHIONJEANS.COM; TOM SMITH d/b/a KICKSONFOOT@GMAIL.COM d/b/a BUYTRUERELIGIONJEANS.NET d/b/a QIQUWANG.NET; QIN KE d/b/a CHEAPTRUERELIGIONJEANSSALE@HOTMAIL.COM d/b/a MRSHUANG123@HOTMAIL.COM; TAN JUN d/b/a WORLD203@HOTMAIL.COM d/b/a BTWGOLD4@HOTMAIL.COM; JINGSHUN HUANG d/b/a HAOTIAN INTERNATIONAL INDUSTRIAL CO., LTD. d/b/a NIKECOOL.COM; CHEN JINSHAN d/b/a

HONG KONG TIMES SQUARE TRADING CO., LTD. d/b/a V9MAIL.COM; CHEN  
ZHIFENG d/b/a ZHIF\_CHEN@163.COM d/b/a HONG KONG JAVON TRADE LTD. d/b/a  
TINRUI.COM; LI FENGNIAN D/B/A FENG08183@SOHU.COM D/B/A CHEAP SKYS CO.  
LTD. d/b/a CHEAP-SKYS.COM; SHOES-GOOGLE CO., LTD. d/b/a  
GOTRADINGZONE.COM d/b/a GOTRADINGZONE@HOTMAIL.COM; GUOFANG XIAO  
d/b/a EMAIL598269039@QQ.COM d/b/a TONGHE TRADE CO., LTD. d/b/a  
THE9THSTREET.COM; BRANDSTRIBE CO., LTD. d/b/a BRANDSTRIBE.COM d/b/a  
ALICEWENNE@HOTMAIL.COM D/B/A SALES@BRANDSTRIBE.COM d/b/a  
BRANDSTRIBE@HOTMAIL.COM D/B/A BRANDSTRIBEINFO@YAHOO.COM;  
XUBEICHAO d/b/a TRADEMEMOMENT CO. LTD. d/b/a TRADEMOMENT.COM; YEMAO  
d/b/a SHUNYUAN INTERNATIONAL EXPORT CO. d/b/a TRADE88N.COM d/b/a  
TRADE88CN@HOTMAIL.COM; WANG FOYUN D/B/A FASHIONCHOOSE TRADE CO.,  
LTD. d/b/a FASHIONCHOOSE.COM d/b/a WYZSHOES@HOTMAIL.COM;  
WWW.BESTKF.COM d/b/a WZJ886@LIVE.CN d/b/a WUQIUPING2004@163.CN;  
CHENZHONG d/b/a FASHION TRADING COMPANY d/b/a FASHION2011STORE.COM  
D/B/A ZOU1973@HOTMAIL.COM; ALLEN IEE d/b/a CHEER TRADE COMPANY d/b/a  
CHEERWHOLESALE.COM; LIN HAO d/b/a HONG KONG FAIRY INTERNATIONAL,  
LTD. d/b/a MORIVER-TRADE.COM d/b/a MOONRIVER-TRADE@HOTMAIL.COM; XIAO  
XU d/b/a TRADEVOID SHOES TRADING CO., LTD. d/b/a TRADEVOID.COM; HUANG  
JINFENG d/b/a HAPPY SPORTS INDUSTRY CO., LTD. d/b/a  
PENGFAHIONSHOES.COM; WEI JIANGGUANG d/b/a CHINARG002@126.COM d/b/a  
LONGFENG INDUSTRY CO., LTD. d/b/a LONGFENGTRADE.COM; XIAOFANG NI d/b/a  
WIWI TRADE CO., LTD. d/b/a WIWITRADE.COM d/b/a WIWITRADE@HOTMAIL.COM;  
CHEN ZIU SONG D/B/A LRGJEANS008@HOTMAIL.COM d/b/a JERSEY TRADE CO.

LTD. d/b/a AAANBAJERSEY.COM; HONEST99896 d/b/a  
DAJIAHAO662009@HOTMAIL.COM; FERSHOUHELLO d/b/a  
XUHUAN0123@YAHOO.COM.CN; ZHAOMIN8898 d/b/a ZHAOMIN82@YAHOO.COM;  
TUNIAN1 d/b/a 402590112@QQ.COM; LINA669925 d/b/a  
YANGYINGHUI0123@YAHOO.COM.CN; AND TRUEYES85 d/b/a  
LYGANG2010@YAHOO.COM.CN, XYZ COMPANIES, AND JOHN AND JANE DOES  
(collectively, “Defendants”) for a Temporary Restraining Order, Order to Disable Certain Web  
Sites, Asset Restraining Order, Expedited Discovery Order and Order to Show Cause for  
Preliminary Injunction (collectively, the “Order”) pursuant to Federal Rule of Civil Procedure 65  
and the Trademark Act of 1946, 15 U.S.C. §§ 1051, *et seq.*, as amended by the Trademark  
Counterfeiting Act of 1984, Public Law 98-473 (October 12, 1984), the Anticybersquatting  
Consumer Protection Act of 1996, Pub. L. 104-153 (July 2, 1996), and the Prioritizing Resources  
and Organization for Intellectual Property Act of 2007, H.R. 4279 (October 13, 2008) (the  
“Lanham Act”), and the Copyright Act, 17 U.S.C. §§ 501, 17 U.S.C. § 106, *et. seq.*, for the  
reason that Defendants are distributing, offering for sale and/or selling, via the Internet, goods  
bearing counterfeit reproductions of the True Religion’s federally registered trademarks and  
copyrights, as listed in True Religion’s Complaint filed concurrently herewith and incorporated  
herein by reference, which trademarks (collectively, the “TRUE RELIGION Marks”) and  
copyrights (the “True Religion Copyrights”) are owned and controlled by the True Religion and  
used in connection with products listed in True Religion’s Complaint and incorporated herein by  
reference (collectively, the “True Religion Products”), and the Court having reviewed the  
Complaint, Memorandum of Law in support of the Order, supporting Declarations and exhibits  
submitted herewith, finds:

1. True Religion has demonstrated that it is entitled to injunctive relief by establishing that it is suffering irreparable harm and that it is likely to succeed on the merits of its claims;

2. With respect to likelihood of success on the merits, True Religion has demonstrated that it is likely to succeed in showing that its TRUE RELIGION Marks and True Religion Copyrights are valid and protectable and entitled to protection;

3. Further with respect to likelihood of success on the merits, True Religion has demonstrated that it is likely to succeed in showing that Defendants are manufacturing, distributing, offering for sale and/or selling counterfeit products -- including, *inter alia*, jeanswear, sportswear, accessories and other goods -- bearing counterfeits of the TRUE RELIGION Marks and True Religion Copyrights ("Counterfeit Products") to buyers in the United States, including in this Judicial District;

4. Further with respect to likelihood of success on the merits, True Religion has demonstrated that it is likely to succeed in showing Defendants are selling Counterfeit Products by operating a network of web sites ("Defendants' Infringing Web Sites") resolving at various domain names set forth in **Exhibit 1** attached hereto, including, without limitation, the following domain names containing the TRUE RELIGION Marks:

- |                                   |                                     |
|-----------------------------------|-------------------------------------|
| 1. truereligionjeans4outlet.com   | 2. cheapertruereligionjeans.com     |
| 3. truereligionjeans2sale.com     | 4. truereligionoutlet-sale.com      |
| 5. truereligion4outlet.com        | 6. truereligionsoutlets2011.net     |
| 7. truereligionjeansoutlet8.com   | 8. jeans-true-religions.com         |
| 9. cheaptruereligionjeanssale.org | 10. truereligionjeansbox.com        |
| 11. cheaptruereligionjeans2.com   | 12. truereligionjeans-outlets1.info |
| 13. truereligionoutlet3.com       | 14. cheaptrue-religionjeans.com     |
| 15. truereligionoutlet8.com       | 16. cheaptruereligionjeanssale.net  |
| 17. truereligionjeanssales.com    | 18. true-religion-jeans-outlet.com  |
| 19. cheaptruereligion8.com        | 20. cheapjeanstruereligion.info     |
| 21. toptruereligionjeans.com      | 22. cheaptruereligionjeans.info     |

- |                                      |                                      |
|--------------------------------------|--------------------------------------|
| 23. fortruereigionjeans.com          | 24. saletruereigionjeans.info        |
| 25. truereligionale.co.uk            | 26. truereligionjeans-outlet.cc      |
| 27. cheaptruereigion.co.uk           | 28. truereligionjeans-outlet.info    |
| 29. truereligion2cheap.com           | 30. truereligionjeans-outlets1.info  |
| 31. truereligion-cheap.com           | 32. truereligion-outlet.cc           |
| 33. truereligion2sale.com            | 34. truereligionoutletjeans.info     |
| 35. truereligionlike.com             | 36. truereligion-outletjeans.info    |
| 37. cheapertruereigionjeans.net      | 38. truereligionoutletjeans.cc       |
| 39. cheaptruereigionjeans2u.com      | 40. truereligionjeanssale.cc         |
| 41. cheaptruereigionjeans2011.com    | 42. truereligionoutlet.cc            |
| 43. truereligionoutletusa.com        | 44. jeans-true-religion.com          |
| 45. cheaptruereigionjeans-sale.com   | 46. truereligionoutletjeans-new.info |
| 47. truereligionjeansbox.com         | 48. jeans-true-religions.com         |
| 49. truereligionjeans4sale.com       | 50. truereligionbrandjeansstore.com  |
| 51. mycheaptruereigionjeans.com      | 52. cheaptruereigionjeanssale.net    |
| 53. cheaptruereigionjeansoutlets.com | 54. cheaptrue-religionjeans.com      |
| 55. cheaptruereigionjeansoutlets.net | 56. cheap-true-religion-jeans.com    |
| 57. buytruereigionjeans.net          | 58. truereligion4sale.com            |

(collectively, the “Infringing Domain Names”);

5. The distribution, offering for sale and sale of Counterfeit Products will result in immediate and irreparable injury to True Religion if injunctive relief is not granted;

6. Defendants have gone to great lengths to conceal themselves and their ill-gotten proceeds from True Religion’s and this Court’s detection including by using multiple false identities and addresses associated with their operations and purposely-deceptive contact information;

7. If True Religion were to proceed on notice to Defendants, Defendants would likely destroy, move, hide or otherwise make the Counterfeit Products, Defendants’ means of selling and distributing Counterfeit Products, financial accounts used in connection with the sale of Counterfeit Products, and business records relating thereto inaccessible to the Court, thus frustrating the ultimate relief True Religion seeks in this action;



8. True Religion's harm from denial of the requested *ex parte* Order would outweigh any harm to Defendants' legitimate interests from granting such an Order;

9. True Religion has represented that it has not publicized the requested Order;

10. True Religion has provided the United States Attorney with reasonable notice of Plaintiffs' application for an Order;

11. Entry of an order other than the requested Order would not adequately achieve the purposes of the Lanham Act to preserve True Religion's equitable remedies for trademark counterfeiting, including, *inter alia*: the restraint of Defendants' counterfeiting operations including Defendants' Infringing Web Sites, the disabling of Defendants' means of distributing, offering for sale and selling Counterfeit Products, the acquisition of the business records relating to Defendants' operations, and preservation of True Religion's right to an equitable accounting of proceeds from Defendants' sale of Counterfeit Products.

THEREFORE, IT IS HEREBY ORDERED that Defendants show cause on or before the 30th day of November 2011 at 11:00 a.m. or as soon thereafter as counsel can be heard, in Courtroom 23B, in the United States District Court for the Southern District of New York, why an order pursuant to Federal Rule of Civil Procedure 65 and Section 34 of the Lanham Act should not be entered granting True Religion a Preliminary Injunction as follows:

(a) Enjoining and restraining Defendants, their officers, agents, servants and employees and any persons in active concert or participation with them, including but not limited to Internet service providers ("ISPs"), from:

(i) using the TRUE RELIGION Marks and True Religion Copyrights or any reproduction, counterfeit, copy or colorable imitation of the TRUE RELIGION Marks and True Religion Copyrights in connection with the distribution, advertising, offer for sale and/or sale of merchandise not the genuine products of True Religion; and



- (ii) passing off, inducing or enabling others to sell or pass off any Counterfeit Products as and for True Religion; and
  - (iii) shipping, delivering, holding for sale, distributing, returning, transferring or otherwise moving, storing or disposing of in any manner jeanswear, sportswear, accessories or other items falsely bearing the TRUE RELIGION Marks and True Religion Copyrights, or any reproduction, counterfeit, copy or colorable imitation of same; and
  - (iv) utilizing the Infringing Domain Names and registering any additional domain names that use or incorporate any of the TRUE RELIGION Marks and True Religion Copyrights; and
  - (v) operating and/or hosting Defendants' Infringing Web Sites.
- (b) Restricting the transfer of Defendants' assets pursuant to the provisions of this Order hereinafter set forth.
- (c) Ordering the domain name registries, including but not limited to VeriSign, Inc., Neustar, Inc., and Public Interest Registry and/or the individual registrars holding or listing one or more domain names used in conjunction with Defendants' Infringing Web Sites, to disable these domain names, through a registry hold or otherwise, and make them untransferable until further order from this Court.

IT APPEARING to the Court that Defendants are distributing, offering for sale and/or selling Counterfeit Products, including via Defendants' Infringing Web Sites, and will continue to carry out such acts unless restrained by Order of the Court, it is hereby:

ORDERED, that pending the hearing on True Religion's application for a Preliminary Injunction, Defendants, including their agents, servants, employees, confederates and any persons acting in concert or participation with them or third parties providing services used in connection with Defendants' operations including, without limitation, Internet Service Providers ("ISP"), registrars, or online third-party selling platforms, having knowledge of this Order by service, actual notice or otherwise be, and are, hereby temporarily restrained from:

- (a) Committing any of the acts set forth in subparagraphs (a)(i)-(v) above;
- (b) Moving, destroying, or otherwise disposing of any items, merchandise or documents relating to the Counterfeit Products, Defendants' Infringing Web Sites, and/or Defendants' assets and operations; and
- (c) Removing, destroying or otherwise disposing of any computer files, electronic files, business records, or documents relating to Defendants' Infringing Web Sites, Defendants' assets and operations or relating in any way to the manufacture, acquisition, purchase, distribution or sale of Counterfeit Products or any reproduction, counterfeit, copy or colorable imitation of the TRUE RELIGION Marks; and it is further

ORDERED, that discovery herein may begin immediately by True Religion by providing actual notice, pursuant to subpoena or otherwise, of this Order to any of the following: (1) Defendants, their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them; (2) any banks, savings and loan associations, payment processors or other financial institutions, including without limitation, PayPal, Inc., or other merchant account providers, payment providers, third party processors, credit card associations (*e.g.*, MasterCard and VISA), which receive payments or hold assets on Defendants' behalf; and (3) any third party service providers, including without limitation, ISPs, back-end service providers, web designers, sponsored search engine or ad-word providers, shippers, domain name registrars, domain name registries or online third-party selling who have provided services for Defendants; and it is further

ORDERED, that any third party providing services in connection with any Defendant and/or Defendants' Infringing Web Sites, including without limitation, ISPs, back-end service providers, web designers, sponsored search engine or ad-word providers, banks, merchant

account providers including PayPal, Inc., third party processors and other payment processing services, shippers, domain name registrars, domain name registries and online third-party selling platforms (collectively “Third Party Providers”) shall within five (5) days after receipt of such notice, provide copies of all documents and records in such person or entity’s possession or control relating to:

- (a) The identities and addresses of Defendants, their agents, servants, employees, confederates, and any persons acting in concert or participation with them and the locations and identities of Defendants’ operations, including without limitation, identifying information associated with Defendants’ Infringing Web Sites, Infringing Domain Names and financial accounts;
- (b) Defendants’ Infringing Web Sites;
- (c) The Infringing Domain Names or any domain name registered by Defendants; and
- (d) Any financial accounts owned or controlled by Defendants, including their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other financial institutions, including without limitation, PayPal, Inc., Western Union, or other merchant account providers, payment providers, third party processors, credit card associations (*e.g.*, MasterCard and VISA); and it is further

ORDERED, that the Temporary Restraining Order shall remain in effect until the date for hearing on the Order to Show Cause set forth above, or such further dates as set by the Court, unless Defendants stipulate, or have not objected, to the Preliminary Injunction; and it is further

ORDERED, that True Religion shall post a corporate surety bond in the amount of ten thousand dollars (\$10,000.00) as security, determined adequate for the payment of such damages as any person may be entitled to recover as a result of a wrongful seizure or restraint hereunder; and it is further

ORDERED, that sufficient cause having been shown, service of this Order together with the Summons and Complaint, which may be made on Defendants by registered electronic mail, and that such service shall be made on or before November 23, 2011 at 5:00 p.m. following service on the Third Party Providers, which is to occur on or before Friday November 18, 2011; and it is further

ORDERED, that True Religion may complete service of process on Defendants by electronic mail at the following one hundred and thirty-seven (137) email addresses, which True Religion has demonstrated will provide adequate notice to Defendants pursuant to Fed. R. Civ.

P. 4:

sarah_trading@live.com	e-trade1988@hotmail.com	smart127@hotmail.com
sarah@psunions.com	dajiahao662009@hotmail.com	wuqiuping2004@163.cn
louisvuitton.sale@hotmail.com	ynyfan@aol.com	lucktrade09@hotmail.com
toptrjeans@hotmail.com	zhnzlin@aol.com	gouzhu66@gmail.com
toptruereligionjeans@hotmail.com	comaupeter@gmail.com	abcbuysell@hotmail.com
fashionjeanshop@gmail.com	sellersalesmith@gmail.com	andear.pt@hotmail.com
sales@truereligionale.co.uk	admin@qq.com	kellylin55@hotmail.com
sarah@psunions.com	173916647@qq.com	pt123@126.com
outletjean@gmail.com	sanbokeyes@yahoo.com	hepinsports2010@yahoo.cn
vip.managerservice@gmail.com	black.hubbard@gmail.com	papy168@hotmail.com
service@truereligionlike.com	storezhs@hotmail.com	ipayebagi@163.com
obcs001@hotmail.com	yourspayment@yahoo.com	guang168ying@hotmail.com
jackrosegates@gmail.com	zhzrong@aol.com	271305515@qq.com
wrsns@msn.com	chczhen@aol.com	wangmeixiang86@yahoo.com.cn
service@myfashionjeans.com	outletjean@gmail.com	xuhuan0123@yahoo.com.cn
jeanstruereligion@gmail.com	vip.managerservice@gmail.com	zhaomin82@yahoo.com
cheaptruereligionjeanssale		
@hotmail.com	trademaster101@hotmail.com	402590112@qq.com
world203@hotmail.com	stephanyu28qz2@hotmail.com	yangyinghui0123@yahoo.com.cn

nikecool@live.com	383068823@qq.com	lygang2010@yahoo.com.cn
V9mall@hotmail.com	ctownbaby@comcast.net	ca10010cn@hotmail.com
tinrui_tradekey@hotmail.com	dradina@mac.com	lan_1802@163.com
		brandstribе.com
javon_trade@hotmail.com	vanessa.nikki@gmail.com	@protecteddomainservices.com
cheapskys@hotmail.com	vikthegoddess@hotmail.co.uk	Email598269039@qq.com
gotradingzone@hotmail.com	wxiaomian@hotmail.com	feng08183@sohu.com
trade369@hotmail.com	mmotrading@yahoo.cn	zhif_chen@163.com
trade369@gmail.com	537553944@qq.com	jask18@163.com
sales@brandstribе.com	kicksonfoot@gmail.com	shtanjuunno1@163.com
brandstribе@hotmail.com	kicksonfoots@gmail.com	819486758@qq.com
brandstribеinfo@yahoo.com	needapairshoe@gmail.com	kicksonfoot@gmail.com
order@trademoment.com	mrshuang123@hotmail.com	sh12345602@hotmail.com
trade88cn@hotmail.com	btwgold4@hotmail.com	dradina@mac.com
wyzshoes@hotmail.com	wholesaledaily@gmail.com	zterry101@gmail.com
wzj886@live.cn	nikecool@live.com	lrgjeans008@hotmail.com
zou1973@hotmail.com	421567127@qq.com	wiwitrade@hotmail.com
sales@cheerwholesale.com	efashiontrade@gmail.com	chinarg002@126.com
cheer_001@hotmail.com	v9mall@hotmail.com	404898547@qq.com
moonriver-trade@hotmail.com	jask18@163.com	pt123@126.com
tradevoid@hotmail.com	262001558@qq.com	505175638@qq.com
tradevoid@yahoo.com.cn	402660558@qq.com	cheerfred@hotmail.com
fashionshop2010@hotmail.com	fengnianly@sohu.com	lan_1802@163.com
papo168@hotmail.com	longbiztrade@hotmail.com	lucyking88@yahoo.com
papo168@163.com	gotradingzone@hotmail.com	sh12345602@hotmail.com
wiwitrade@gmail.com	kaka368@163.com	ca10010cn@hotmail.com
aaanbajersey@hotmail.com	trade369@hotmail.com	1554253616@qq.com
aaanbajersey@yahoo.com.cn	alicewenne@hotmail.com	XylonDamek@hotmail.com
	marry-gan@hotmail.com	kandyCarroll@hotmail.com

; and it is further

ORDERED, that True Religion's counsel file with the court within ten (10) days after this Order is executed, an affidavit or declaration setting forth: (a) the date on which the Order was executed, (b) the date and means with which the Defendants' were served with a copy of the Order, and (c) a description of the domain names, websites and other assets that were disabled and/or restrained; and it is further

ORDERED, that in accordance with 15 U.S.C. § 1116(a) and this Court's inherent equitable power to issue provisional remedies ancillary to its authority to provide final equitable relief, Defendants and their officers, servants, employees and agents and any persons in active concert or participation with them, and any banks, savings and loan associations, payment processors or other financial institutions, including without limitation PayPal, Inc., or other merchant account providers, payment providers, or third party processors for any Defendant, any of Defendants' operations, Defendants' Infringing Web Sites or for any other website owned or controlled by Defendants, who receive actual notice of this Order, shall immediately locate all accounts connected to Defendants or Defendants' Infringing Web Sites and that such accounts be temporarily restrained and enjoined from transferring or disposing of any money or other of Defendants' assets, not allowing such funds to be transferred or withdrawn, and not allowing any refunds, charge-backs, or other diminutions to be made from such accounts pending further order from this Court; and it is further

ORDERED, that upon two (2) business day's written notice to the Court and True Religion's counsel, any Defendant may, upon proper showing, appear and move for the dissolution or modification of the provisions of this Order concerning the restriction upon transfer of Defendants' assets; and it is further

ORDERED that, in accordance with 15 U.S.C. § 1116(a) and this Court's inherent equitable power to issue provisional remedies ancillary to its authority to provide final equitable relief, the domain name registries, including but not limited to VeriSign, Inc., Neustar, Inc., and Public Interest Registry, and/or the individual registrars holding or listing one or more of the domain names used in conjunction with Defendants' Infringing Web Sites shall, within three (3) days of receipt of this Order, temporarily disable these domain names, through a registry hold or

otherwise, and make them inactive and untransferable pending further order from this Court; and it is further

ORDERED that, in accordance with 15 U.S.C. § 1116(a) and this Court's inherent equitable power to issue provisional remedies ancillary to its authority to provide final equitable relief, any third party providing services in connection with any Defendant and/or Defendants' websites, including without limitation ISPs, back-end service providers, affiliate program providers, web designers, and sponsored search engine or ad-word providers, shall immediately temporarily disable service to any and all Defendants' Infringing Web Sites; and it is further


ORDERED, that Defendants' answering papers, if any, shall be filed with the Clerk of this Court and served upon the attorneys for True Religion by delivering copies thereof to the offices of Greenberg Traurig, 200 Park Avenue, 34<sup>th</sup> Floor, New York, NY 10166 Attention: Scott Gelin, Esq., before 5:00 p.m. on November 28, 2011. Any reply shall be filed and served by True Religion by 11:00 a.m. on November 30, 2011; and it is finally

ORDERED, that this action shall remain sealed by the Court until the date for hearing on the Order to Show Cause set forth above, at which time the Clerk shall remove the seal.



Defendants are hereby given notice that failure to attend the hearing scheduled herein may result in confirmation of the seizure authorized herein, destruction or other disposition of the goods seized, if any, immediate issuance of the prayed-for Preliminary Injunction to take effect immediately upon expiration or dissolution of the Temporary Restraining Order, and shall otherwise extend for the pendency of this litigation relief upon the same terms and conditions as comprise this Temporary Restraining Order. Defendants are hereby given further notice they shall be deemed to have actual notice of the issuance and terms of such Preliminary Injunction and any act by them or any one of them in violation of any of the terms thereof may be considered and prosecuted as contempt of this Court.

SIGNED this 17<sup>th</sup> day of November 2011.

  
UNITED STATES DISTRICT COURT JUDGE

**Exhibit 1**

1. truereligionjeans4outlet.com
2. truereligionjeans2sale.com
3. truereligion4outlet.com
4. truereligionjeansoutlet8.com
5. cheapjeanssale2.com
6. cheaptruereligionjeanssale.org
7. cheaptruereligionjeans2.com
8. truereligionoutlet3.com
9. truereligionoutlet8.com
10. brandjeansonline.org
11. truereligionjeanssales.com
12. bagsoutletss.com
13. religionoutlets.com
14. toptrjeans.com
15. cheaptruereligion8.com
16. toptruereligionjeans.com
17. fashionjeanshop.com
18. fortruereligionjeans.com
19. truereligionale.co.uk
20. cheaptruereligion.co.uk
21. truereligion2cheap.com
22. truereligion-cheap.com
23. truereligion2sale.com
24. jeanswholesaling.com
25. outlet-jeans.com
26. truereligionlike.com
27. cheapertruereligionjeans.net
28. cheaptruereligionjeans2u.com
29. cheaptruereligionjeans2011.com
30. truereligionoutletusa.com
31. cheaptruereligionjeans-sale.com
32. truereligionjeansbox.com
33. truereligionjeans4sale.com
34. mycheaptruereligionjeans.com
35. cheaptruereligionjeansoutlets.com
36. cheaptruereligionjeansoutlets.net
37. myfashionjeans.com
38. buytruereligionjeans.net (qiquwang.net)
39. cheapertruereligionjeans.com
40. truereligionoutlet-sale.com
41. truereligionoutlets2011.net
42. discounttrjeans.com
43. true-religion-jeans-outlet.com
44. cheapjeanstruereligion.info
45. cheaptruereligionjeans.info

46. saletruereligionjeans.info  
47. truereligionjeans-outlet.cc  
48. truereligionjeans-outlet.info  
49. truereligionjeans-outlets1.info  
50. truereligion-outlet.cc  
51. truereligionoutletjeans.info  
52. truereligion-outletjeans.info  
53. truereligionoutletjeans.cc  
54. truereligionjeanssale.cc  
55. truereligionoutlet.cc  
56. jeans-true-religion.com  
57. truereligionoutletjeans-new.info  
58. jeans-true-religions.com  
59. truereligionbrandjeansstore.com  
60. nikecool.com  
61. v9mall.com  
62. tinrui.com  
63. cheap-skys.com  
64. gotradingzone.com  
65. the9thstreet.com  
66. brandstribе.com  
67. trade88cn.com  
68. fashionchoose.com  
69. bestkf.com  
70. cheerwholesale.com  
71. moriver-trade.com  
72. tradevoid.com  
73. inttopbrand.com  
74. toshoesa.com  
75. pengfashionshoes.com  
76. longfengtrade.com  
77. wiwitrade.com  
78. aaanbajersey.com  
79. cyberdealing.com  
80. cheaptruereligionjeanssale.net  
81. cheaptrue-religionjeans.com  
82. cheap-true-religion-jeans.com  
83. world203.com  
84. truereligion4sale.com  
85. franklinmarshalls.com  
86. trademoment.com